

Dr. Derrick Leedy
PO Box 1164
Nome, AK 99762
Phone 443-2800
Fax 443-4771
E-mail leedy@nook.net

1-20-00

Mr. Ron Sutcliffe
Special Prosecutions
State of Alaska
Fax No. (907) 269-6270

Dear Mr. Sutcliffe,

I spoke with you about some environmental water violations around Nome Alaska on or about January 6, 2000. I have addressed the Nome Common Council, Alaska State Troopers, and the Alaska Department of Fish and Game on my concerns.

When we spoke you mentioned you would like to have some information on the Fish and Game Habitat Permit violations in order to open a file.

I have included this information.

Thank you for directing me first to Trooper Todd of the Nome branch of the Alaska State Troopers. He is looking into the permit alleged violations. He seems very motivated but he was the first to say that he did not know very much about environmental law.

Still I have a lot of confidence in him that he can utilize resources such as yourself or Mr. Coyne for guidance.

In my letter I refer to being intimidated and roadblocked by Mr. Phil Saint George. Mr. Saint George is the new manager/geologist of NovaGold Resources, Inc. The old company was Alaska Gold. NovaGold leases the land to APP mining and Kruttsch mining. I notified Alaska State Troopers and the City of Nome of the incident.

Sincerely,



Dr. Derrick Leedy

Dr. Derrick Leedy
PO Box 1164
Nome, AK 99762
Phone 443-2800
Fax 443-4771
E-Mail leedy@nook.net

1-19-00

Letter to the Nome Common Council

This letter is an updated version of the letter I sent to the Nome Common Council on October 7, 1999.

The letter clearly voices my concerns about the lack of protection of Anvil Creek as a creek and as a viable fish habitat. My second concern is that the City needs to protect our aquifer that supplies Nome's water called Moonlight Springs.

Mining is totally responsible for the contamination of Anvil Creek. Anvil Creek flows into the Snake River and the Snake River empties at Nome into Norton Sound. The contamination is carried into both the Snake River and Norton Sound.

Two mining operations, APP and Betty and August Krutzsch, are now within our watershed and have been in violation of their State of Alaska Fish and Game Habitat permit in the spring of 1998 and 1999. The most recent violation has been in the fall of 1999.

The average "natural" turbidity of Anvil creek is less than 5 NTU's. Under current DEC regulations the turbidity should not exceed 10 NTU's or 5 NTU's above "natural" conditions.

Anvil Creek has been ruined. I have attempted through Drew Grant of DEC to have it placed on the State contaminated Waterbody list. To date it has not been placed on the list. Anvil creek can be returned to its original state with the proper reclamation. Only then once again it can contribute and enhance are local fish population.

On September 22, 1999 I was with my family playing ball on Glacier Creek Road around Anvil Creek just below Bonanza Hill. As I was returning home that evening I noticed that Specimen Gulch Creek that comes out of the Krutzsch mine was very clear. I was very pleased to see clean water as the Krutzsch mine had been heavily sanctioned by Ryan Hull of DNR for extremely poor and sloppy mining practices in 1997 and 1998. This led to massive contamination of Anvil Creek in 1998. In retrospect the problem goes back for a number of years but the first data of contamination was collected by myself and ADFG in 1998. Springtime levels of over 1000 NTU's were common in Anvil Creek and Specimen Gulch Creek.

As I continued South to Nome I stopped at APP mining most Northern pit. I was absolutely horrified that the pit was full of water that was coming from an aquifer located on Anvil Mountain. The water appeared to be deep. I observed that there was no obvious source of water entering the pit. There was an 8 inch hose pumping at an estimated rate of 500,000 thousand gallons per day to the wash plant located less than a quarter of a mile to the South. Again as I headed South within a quarter of a mile I noted a huge flow of water going through the culvert and I estimated the flow to be the same, 500,000 gallons per day. The total amount of water was going West down the hillside and entering Anvil Creek. The water was extremely turbid. Based on my past experiences I estimated it to be around 900 NTU's. I was sickened again that Anvil Creek was being contaminated not

only in the Spring but now in the Fall! I then headed toward Nome but stopped at Anvil Creek as it goes under the Teller highway at the shooting range. The water was murky. I collected a sample midstream and middepth at 4pm or 16:00 hours. I had it tested by the City of Nome the following morning the results were 58.6 NTU's. Remember this is a few miles from the culvert! I notified Mr. Joran Freeman from Norton Sound Health Corporation and our City Manager Mike Yanez of the contamination the following day. Mr. Freeman took some pictures and they were given to Mayor Handleland. The pictures were also sent to DNR. Mr. Yanez was very concerned and he said to me he would speak to the landowner who leases the land to APP. The owner of the land is NovaGold Resources, Inc. I was informed that Mayor Handleland and Randy Romenesko drove to the APP mine and observed the flow of water through the culvert.

I took another measurement at Anvil Creek Shooting Range at 8:30 PM on September 30, 1999. It measured 4.48 NTU's. This measurement reflected "natural conditions"

Next at 9pm I recorded Moonlight Springs. It was 0.25 NTU's. This is an acceptable reading for turbidity.

The next day October 1, 1999 I received a urgent phone call from Mr. Joran Freeman who works in the Office of Environmental Health at Norton Sound Health Corp. He was working with our City Engineer, Randy Romenesko on doing site evaluations for Nome's future wind generation project. As they headed down the Teller highway they observed that Anvil Creek at the shooting range was very murky. When they returned to Nome that afternoon Mr. Freeman informed me of the contamination of Anvil Creek. We did an investigation. We sampled Anvil Creek at the shooting range at 2pm. It was now at 90 NTU's! Just the day before it measured only 4.48 NTU's. Needless to say we wanted to find the source of the contamination.

We went up the Glacier Creek road and passed APP mining. They were now recycling their water and the water from their operation was not the source of the contamination. We continued North and observed Specimen Gulch Creek coming directly out of the Krutzsch mine. It was extremely muddy. A measurement was taken at 2:30 PM. It was 910 NTU's!

The following additional tests were done on a certified NTU instrument by the City of Nome.

October 1, 1999	9:05 pm	Shooting Range	14.90 NTU
October 2, 1999	4:32pm	Shooting Range	6.82 NTU
October 1, 1999	9:24pm	Specimen Gulch	358.00 NTU

In October 2, 1999 I was roadblocked near Specimen Gulch by Mr. Phil Saint George. Because of his aggressive behavior and fear for my personal safety I did not obtain a water sample.

My personal observation was that Specimen Gulch Creek had cleared some and it was now just cloudy.

I returned the next day and did some more tests.

October 3, 1999	9:30 am	Shooting Range	4.12 NTU
-----------------	---------	----------------	----------

October 3, 1999 10:00 am Specimen Gulch 23.60 NTU

On October 3, 1999 at 10 am I observed no mining activity at the Kruttsch mine located on Specimen Gulch Creek.

Conclusions

Both mines were in violation of their 1999 Alaska Fish Habitat Permits.

The turbidity readings correlate very well at the shooting range and at the mines that clearly support that when muddy water was either observed or observed and measured the downstream measurements were greatly increased. When mine contamination was not observed or measured the Anvil Creek turbidity at the shooting range returned to natural conditions.

I strongly recommend based on this evidence and the evidence gathered by myself and Alaska Department of Fish and Game in 1998 and by EPA and DNR in 1999 that the parties involved should be found in violation of their permits. Anvil Creek has been dirty for a number of years before the testing began. Future permits should be denied.

Derrick Leedy

cc. Alaska State Troopers

Alaska Department of Fish and Game

MAY/JUNE 1998

MINING TURBIDITY DISCHARGE LOG
EPA # 071-6561

3929 154x

LINDY GOSSEY ERN
6-9-98 FROM DEEDY

From DeDeedy
Follett Name 94762
Fax 4434971 Above 443-2800

SAMPLE LOCATION	DATE/TIME COLLECTED	DATE/TIME TESTED	TEST RESULTS	SAMPLED BY	TESTED BY
Anvil Creek Bridge	5-28-98-1750	5-29-98-1635	>1000.0	Robert Russell	Robert Russell
Upper Snake River Bridge	5-28-98-1850	5-29-98-1640	52.0	Robert Russell	Robert Russell
Dexter Creek Beam Reel	5-28-98-1915	5-29-98-1650	823.0	Robert Russell	Robert Russell
Anvil Creek	6-3-98-2142	6-3-98-2250	>1000.0	Robert Russell	Robert Russell
Anvil Creek Walsh Drainage	6-4-98-1950	6-4-98-2020	702.0	Robert Russell	Robert Russell
Anvil Creek Leutzsch	6-4-98-1955	6-4-98-2025	>1000.0	Robert Russell	Robert Russell
Dexter Creek Beam Reel	6-4-98-1851	6-4-98-2030	>1000.0	Robert Russell	Robert Russell
Basin Creek at Road	6-4-98-1922	6-5-98-0925	3.0	Leedy	Robert Russell
Nome River 25 mile	6-4-98-1945	6-5-98-0930	3.0	Leedy	Robert Russell
Crater Creek Beam Reel	6-4-98-2017	6-5-98-0935	10.0	Leedy	Robert Russell
Anvil Creek Whiteford	6-1-98-2128	6-2-98-0905	>1000 NTU	Leedy pH=7.72	Robert Russell
Anvil Creek 50 yds E of Road	6-1-98-2130	6-2-98-0905	>1000 NTU	Leedy pH=7.72	Robert Russell
Anvil Creek 1 mi (up) E of Leutzsch	6-2-98-2030	6-3-98-0873a	PENDING VOC	Leedy -	Not Testless AHC
Snake River Upper	6-2-98-2036	6-3-98-0730	12.0 NTU	Leedy	Robert Russell
Snake River S of Leutzsch	6-2-98-2103	6-3-98-0817	21.0 NTU	Leedy	Robert Russell
Anvil Creek 1 mi upstream	6-3-98-2100	6-3-98-0820	>1000 NTU	Leedy	Robert Russell
Anvil Creek 1 mi upstream	5-28-98-1750	5-29-98-1750	>1000 NTU	Leedy	Robert Russell
Snake River 200 yds	5-28-98-1650	5-29-98-1650	822 NTU	Leedy	Robert Russell
Snake River 200 yds	5-28-98-1758	5-29-98-1650	52 NTU	Leedy	Robert Russell
Snake River 100 yds	6-8-98-2230	6-9-98-1815	19 NTU pH 7.65	Leedy	Robert Russell
Snake River 100 yds	6-8-98-2235	6-9-98-1816	215 NTU pH 7.70	Leedy	Robert Russell
Dexter Creek 200 yds E of Road	6-7-98-1735	6-8-98-1000	>1000 NTU	Leedy	Robert Russell

Diluted 50% NTU = 1676

Page 1

TESTING IN 1988

8661

11

9N

152

1

3

08-

SEPT/OCT/99

* TESTING ALSO PRESENT DURING
TESTING ME. TODY SHIELDS
CITY OF NONE

6661